

## EXHIBIT 2



Magellan Ltd.  
1st Floor Tudor House  
Le Bordage  
St. Peter Port  
Guernsey  
GY1 1DB  
6<sup>th</sup> March 2023

**VIA ELECTRONIC MAIL**

Mr Brian Wainger  
Principal  
Kaleo Legal  
4456 Corporation Lane, Suite 135  
Virginia Beach, VA 23462

Dear Mr Wainger

**Re: RMS TITANIC, Inc. v THE WRECKED AND ABANDONED VESSEL. CIVIL ACTION NO. 2:93cv902**

Thank you for your letter dated 23<sup>rd</sup> February, 2023 which I received via email on the same date.

The content of your letter is noted. I do not agree with all of the comments made in your letter; however, I see no positive benefit for us in exploring the specifics of language used at this time.

Under an agreed confidentiality agreement, Magellan has previously provided a Dive Plan to RMS Inc, which was requested and reviewed by RMS Inc. My understanding was that the Dive Plan provided did provide answers to all the questions raised, and in RMS Inc own words, was '...tremendously helpful for our [RMS Inc] position'.

I would confirm as follows, all of which has been documented previous.

- Magellan and its agents maintained a zero-contact policy with the area and its contents to preserve the site and its surroundings.
- Magellan and its agents did not disturb or interfere with the site.
- Magellan did not perform recovery operations at the site. We have categorically confirmed this previous.

Yours sincerely

David J. Thompson  
Group Chief Operating Officer

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